

FILED

JAN 3 2019

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF OKLAHOMA

1. ASHLEY D. PRYOR,

Plaintiff,

v.

2. G4S SECURE SOLUTIONS (USA)
INC.,

Defendant.

19 CV 004 TCK - FHM

Case No.:

Attorneys' Lien Claimed

Jury Trial Demanded

COMPLAINT

COMES NOW Plaintiff and for her claim and cause of action against Defendant states and alleges:

1. Plaintiff, Ashley D. Pryor, is a resident of Tulsa County, Oklahoma.
2. Defendant, G4S Secure Solution (USA) Inc., is a corporation existing under the laws of the State of Oklahoma.
3. Plaintiff invokes the jurisdiction of this court under 28 U.S.C. § 1331, in that this action arises under the Family and Medical Leave Act of 1993, as amended ("FMLA"), 29 USC §§ 2601 et seq., and regulations promulgated thereunder.
4. At all times material herein Defendant has acted by and through its agents, servants and employees who were acting within the scope of their agency, service and employment.
5. At all times material herein Defendant has been subject to the provisions

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of the FMLA and Plaintiff, in her employment with Defendant, was protected by same.

6. Plaintiff was an employee of Defendant until December 3, 2018, when she was terminated by Defendant in retaliation for her exercising her rights under the FMLA and in violation of FMLA protections, including time off, time to furnish medical information and otherwise.
7. As a result, Plaintiff has lost wages and benefits and been otherwise damaged.

WHEREFORE, premises considered, Plaintiff prays for judgment against Defendant in the sum of \$150,000, an equal amount in liquidated damages, interest, reinstatement to her job position, equitable relief, and such other and further relief to which Plaintiff is deemed entitled.

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

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